

UNITED STATES DISTRICT COURT

for the

Southern District of OhioUnited States of America
v.

Case No. 2:22-mj-406

Isabel Odir CASTELLANOS
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/06/2022 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:*Code Section*
21 U.S.C. §§ 846*Offense Description*
Conspiracy to possess with the intent to distribute 400 grams or more of fentanylThis criminal complaint is based on these facts:
See attached Affidavit, which is fully incorporated herein.☒ Continued on the attached sheet.Special Agent Noah Bookman
*Complainant's signature*DEA Special Agent Noah Bookman
Printed name and title

Sworn to before me and signed in my presence.

Date: 6/9/2022City and state: Columbus, OhioChelsey M. Vascura
Chelsey M. Vascura
United States Magistrate Judge
*Judge's signature*Honorable Chelsey M. Vascura, U.S. Magistrate Judge
Printed name and title

Case No. _____

AFFIDAVIT

I, Noah Bookman, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent of the Drug Enforcement Administration (DEA), assigned to the Detroit Field Division, Columbus District Office (CDO). As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1).

2. Prior to being employed by the DEA, I graduated from the Hocking College Ohio Peace Officer Training Academy located in Nelsonville, Ohio, in June 2005. I received approximately 16 weeks of specialized police training including but not limited to search and seizure, investigative techniques, testifying in court, evidence collection, interview and interrogation, and controlled substance identification. I also received an Associate’s Degree from Hocking College in Police Science. From April 2005 to January 2007, I was employed by the Hocking County Sheriff’s Office, Patrol Bureau. From January 2007 to June 2014, I was employed by the City of Lancaster Police Division, assigned to the Patrol Bureau. From June 2012 to September 2014, I was assigned to the Major Crimes Unit. In September 2014, I was hired by the DEA. In February 2015, I graduated from the DEA Academy and reported directly to the CDO.

3. During the course of my law enforcement career, I participated in numerous investigations involving narcotics trafficking. I received specialized training in narcotics trafficking and money laundering from the DEA and I have been personally involved in investigations concerning the possession, manufacture, transportation, distribution, and importation of controlled substances, as well as methods used to finance drug transactions. I have experience in debriefing defendants and interviewing participating witnesses, cooperating individuals, and other persons who have personal

knowledge and experience regarding the amassing, conversion, transportation, distribution, and concealment of records and proceeds of trafficking in controlled substances. As a special agent and a police officer, I participated in the execution of numerous search warrants at the residences and businesses of narcotics traffickers, safe houses, crack houses, and I participated in numerous arrests for drug-related offenses. I have drafted numerous search warrants. As a special agent, I participated in investigations targeting individuals and organizations trafficking heroin, fentanyl, cocaine, cocaine base (“crack”), marijuana, methamphetamine, and other controlled substances, as defined in Title 21, United States Code, Section 801.

PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of an application for a federal arrest warrant and complaint against Isabel **CASTELLANOS**. My knowledge of this investigation is based upon my own personal observations, as well as the observations and investigations conducted by other law enforcement officers and investigators concerning the facts and circumstances involved in the subject investigation. I have not included in this Affidavit all the facts known to me, but only that information sufficient to establish probable cause to believe the following;

- Isabel **CASTELLANOS** have committed a violation of Title 21, United States Code, Section 846, conspiracy to possess with the intent to distribute 400 grams or more of fentanyl.

SUMMARY OF PROBABLE CAUSE

1. In May 2021, investigators, from the Drug Enforcement Administration at the Columbus District Office, established an investigation into the Isabel **CASTELLANOS** (hereinafter, “**CASTELLANOS**”) drug trafficking organization (hereinafter, “**DTO**”).

2. Through a credible source, investigators learned CASTELLANOS would be traveling into Columbus, Ohio from the Los Angeles, California with a large amount of narcotics. CASTELLANAS would be transporting the narcotics in a semi-truck.

3. On or about June 6, 2022, an Ohio State Highway Patrol marked unit conducted a traffic stop on a semi-truck, bearing Arizona registration of AL14077, and the trailer, bearing California registration of 4SD3831, for a traffic infraction. The traffic stop occurred on I-70 traveling eastbound near State Route 56. The driver of the vehicle was identified as Isabel CASTELLANOS.

4. During the course of the vehicle stop, Trooper Rucker deployed his drug detection canine on the suspect vehicle and the canine did give a positive indication to the presence of narcotic odor coming from the vehicle. Troopers located and seized approximately 54,340 gross grams (54.34 kilograms) of suspected fentanyl and 4,620 gross grams (4.62 kilograms) of suspected cocaine from the sleeper area of the semi-truck.

5. The Troopers advised CASTELLANOS of his Miranda rights. CASTELLANOS understood his rights and agreed to continue with the interview.

6. Subsequently, investigators conducted a consent search of a stash house in Columbus, Ohio. During the search of the residence, investigators seized approximately 290 gross grams of suspected heroin, 3,410 gross grams (3.41 kilograms) of suspected cocaine, 3,600 gross grams (3.6 kilograms) of suspected marijuana, 8,950 gross grams (8.95 kilograms) of suspected methamphetamine, 19,550 gross grams (19.55 kilograms) of suspected fentanyl, a large amount of United States currency (drug proceeds), and three firearms.

7. During the interview, CASTELLANOS acknowledged the transportation of narcotics for an unknown person. CASTELLANOS took ownership of the narcotics

seized at the residence. CASTELLANOS admitted to be working off a debt for an unknown person.

CONCLUSION

1. Based upon this information, your affiant believes probable cause exists that Isabel CASTELLANOS has violated 21 U.S.C. §§ 846 conspiracy to possess with the intent to distribute 400 grams or more of fentanyl.

Special Agent Noah Bookman

Noah Bookman

Special Agent

Drug Enforcement Administration

Subscribed and sworn to before me
this 9th day of June 2022.

Chelsey M. Vascara

Honorable Chelsey M. Vascara
United States Magistrate Judge